

COMMONWEALTH OF MASSACHUSETTS

DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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| New England Telephone and Telegraph Company, d/b/a | ) |               |
| Bell Atlantic-Massachusetts-Section 271 of the     | ) | D.T.E. 99-271 |
| Telecommunications Act of 1996 Compliance Filing   | ) |               |
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**COMMENTS OF SPRINT COMMUNICATIONS COMPANY L.P. ON AT&T'S  
EMERGENCY MOTION TO STAY TRANSACTION TESTING UNTIL KPMG'S  
LAST-MINUTE PROPOSAL TO WEAKEN THE VOLUME TESTING  
STANDARDS IS RESOLVED, AND ALL OF BELL ATLANTIC'S SYSTEMS  
ARE CAPABLE OF HANDLING COMMERCIAL VOLUMES**

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Dated: February 1, 2000

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Pursuant to the Hearing Officers' electronic notice dated January 31, 2000, Sprint Communications Company L.P. ("Sprint") hereby submits the following comments on AT&T's Motion to Stay Transaction Testing.

**INTRODUCTION**

On January 28, 2000, on its weekly call with participating CLECs, KPMG orally stated its intention to propose changes to the testing of Bell Atlantic's Operations Support System ("OSS") systems. In particular, KPMG's proposal is to substantially weaken its volume and stress testing of Bell Atlantic's pre-order and order OSSs and staff capacity.

On January 31, 2000, AT&T Communications of New England, Inc. ("AT&T") filed a Motion to Stay Transaction Testing Until KPMG's Last-Minute Proposal to Weaken the Volume Testing Standards is Resolved, and All of Bell Atlantic's Systems are Capable of Handling Commercial Volumes ("Motion"). In its Motion, AT&T

requests that the Department of Telecommunications and Energy (“Department”) order KPMG not to commence the transaction testing portion of its evaluation of the pre-order and order processing capabilities of Bell Atlantic’s OSS until: (1) the Department has resolved policy issues raised by KPMG regarding the manner in which volume and stress testing of these OSSs will be conducted; and (2) Bell Atlantic can make a good faith representation that its systems can handle commercial volumes of unbundled network element (“UNE”) pre-order and order transactions in Massachusetts, on top of commercial volumes in New York.

On January 31, 2000, the Hearing Officers sent an electronic message to the parties in the above-referenced docket directing that comments on AT&T’s Motion to Stay Transaction Testing must be filed by 2:00 p.m. on February 1, 2000.

For the reasons set forth below, Sprint supports AT&T’s Motion to Stay Transaction Testing.

**I. ADEQUATE OSS ARE ESSENTIAL TO THE DEVELOPMENT OF LOCAL COMPETITION IN MASSACHUSETTS**

As Sprint has maintained throughout this proceeding, the importance of adequate OSS systems to the development of local competition in Massachusetts cannot be understated. In essence, the ability of customers to switch smoothly between competitors in the local market will depend entirely on the adequacy of Bell Atlantic’s OSS systems. A customer who has a negative experience in choosing to switch to a competitive local exchange carrier (“CLEC”) will likely be unwilling to do so again. Similarly, large-scale entry into the residential local market by CLECs critically depends on the ability of Bell Atlantic to smoothly handle large volumes of orders.

The third party test being conducted by KPMG plays a critical role because it is the means by which the Department and CLECs can determine whether Bell Atlantic's systems are operationally ready and provide an appropriate level of performance.

## **II. IN LIGHT OF THE NEW YORK EXPERIENCE, IT DEFIES LOGIC TO WEAKEN THE MASSACHUSETTS OSS TEST**

Now is not the appropriate time to be proposing or considering a reduction of the volume transaction or stress-testing of Bell Atlantic's OSS systems. The recent OSS experience in New York provides ample support for this assertion. As indicated by AT&T in its Motion, Bell Atlantic's systems are already suffering from substantial volume-related problems in New York. Motion at 9. In fact, due to these problems AT&T and MCI filed complaints with the New York Public Service Commission. As AT&T reported, almost **10,000** of its UNE Platform Orders to Bell Atlantic were lost in Bell Atlantic's systems. Sprint is also experiencing similar problems in New York.

What makes this information from New York even more significant is the fact that Bell Atlantic uses many of the same OSSs and personnel to support UNE pre-order and order functions in both Massachusetts and New York. It defies logic for KPMG to propose weakening the OSS test in Massachusetts in light of this evidence. The Department must not lose sight of the goal here, which is to ensure that Bell Atlantic has adequate OSS systems that are operationally ready and provide an appropriate level of performance.

### **III. THE DEPARTMENT SHOULD ATTEMPT TO RESOLVE OSS PROBLEMS NOW INSTEAD OF WAITING FOR THEM TO DEVELOP LATER**

The Department should heed the old adage measure twice, cut once. Instead of weakening the test, now is the time to make sure the test does what it was intended to do—namely, ensure that Bell Atlantic’s systems are operationally ready and provide an appropriate level of performance. Changing the third party test in a manner that makes it easier for Bell Atlantic to pass will not resolve any OSS problems. Alternatively, a rigorous test will likely prevent more problems down the road.

Furthermore, the fact that the Department has performance measures in place, or that parties can file a complaint with the Department if problems arise later is beside the point. Such mechanisms do not justify failing to conduct a rigorous test. Waiting for the problem to develop instead of attempting to resolve it ahead of time is not reasonable. In other words, telling someone not to act until there is a problem is like telling someone do not worry about wearing a seat belt in a town because it has an emergency room. The experience in New York provides convincing evidence that Bell Atlantic will experience similar problems in Massachusetts without rigorous testing of Bell Atlantic’s OSS. As AT&T points out, the Department Staff will have to deal with these problems at a later date.

### **CONCLUSION**

For the foregoing reasons Sprint respectfully requests that the Department grant AT&T’s Motion to Stay Transaction Testing.

Respectfully submitted,

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